

ORIGINAL

Nixon, Hargrave, Devans & Doyle  
Attorneys and Counselors at Law

ONE KEYCORP PLAZA  
ALBANY, NEW YORK 12207  
(518) 427-2650

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS  
SUITE 800  
ONE THOMAS CIRCLE  
WASHINGTON, D.C. 20005  
(202) 457-5300  
FAX: (202) 457-5355

30 ROCKEFELLER PLAZA  
NEW YORK, NEW YORK 10112  
(212) 603-3000

1600 EMPIRE TOWER  
BUFFALO, NEW YORK 14202  
(716) 853-8100

990 STEWART AVENUE  
GARDEN CITY, NEW YORK 11530  
(516) 832-7500

CLINTON SQUARE  
POST OFFICE BOX 1051  
ROCHESTER, NEW YORK 14603  
(716) 263-1000

WRITER'S DIRECT DIAL NUMBER:

(202) 457-8321

July 7, 1992

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: CC Docket No. 92-77, Billed Party Preference for  
InterLATA Calls

Dear Ms. Searcy:

Attached for filing in the above-referenced docket are the Comments of Illinois Department of Central Management Services, Bureau of Communications & Computer Services. A facsimile signature is submitted, pursuant to Section §1.52 of the Commission's Rules.

Respectfully submitted,

  
Veronica M. Ahern

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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In the Matter of

Billed Party Preference for  
InterLATA Calls

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)  
) CC Docket No. 92-77  
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COMMENTS OF ILLINOIS  
DEPARTMENT OF CENTRAL MANAGEMENT SERVICES,  
BUREAU OF COMMUNICATIONS & COMPUTER SERVICES

The Illinois Department of Central Management Services ("CMS"), Bureau of Communications & Computer Services ("BCCS"), hereby submits its comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above captioned proceeding released May 8, 1992.

INTRODUCTION

CMS is a State agency and BCCS is the Bureau with authority to contract for telecommunications within Illinois. BCCS manages an all digital statewide network consisting of 150,000 telephones, point-to-point voice and data services, "1+", "0+" and "0-" services, with annual expenditures of nearly 100 million dollars. This statewide network serves universities and the needs of government offices. BCCS also procures telecommunications services provided at 27 correctional facilities.

## BACKGROUND

Although the Commission has tentatively decided that billed party preference is in the public interest<sup>1</sup>, there are relevant considerations which the NPRM did not identify and for which BCCS seeks consideration.

### I. Billed Party Preference Will Styria Security At Correctional Facilities And Will Create A Budget Crisis

Billed party preference would prevent BCCS and other government institutions such as prisons, jails and detention centers from providing telecommunication services for inmate usage that includes both public security and minimal governmental funding features. Correctional facilities providing inmate housing have become dependent on the specialized carrier-based systems that equip the correctional staffs with necessary controls to curb inmate abuses to the public-at-large. These abuses are generally in the form of personal harassments, illegal behavior and telecommunication and business fraud. Billed party preference will proliferate inmate fraud and public harassment, as well as diminish the institutional controls that currently are in place.

Further BCCS and other institutions will be deprived of revenue streams that partially offset the enormous cost of institutional housing and imprisonment for relatively all

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<sup>1</sup> Notice of Proposed Rulemaking in CC 92-77, released May 8, 1992 at Paragraph 13.

governmental authorities. Almost every government entity is wrestling with revenue shortfalls and budget cuts and BCCS is not immune. Billed party preference will place an added cost burden on these entities. Without the revenues derived from commissions, BCCS would experience a budget deficit of about 4.3 million dollars.

Other institutions that could be affected by the adoption of billed party preference include universities and government-supported hospitals. Similar budget considerations to those at correctional facilities would apply.

## **II. Billed Party Preference Will Reduce Competitive Choices Available to Meet BCCS Specialized Needs**

If billed party preference is introduced, BCCS expects that decision will reduce the range of IXCs and OSPs competing to meet its particular needs. One of the competitors introduced the following innovations at various Illinois correctional facilities:

- Added more phones in each correctional facility.

Due to the prisons being overcrowded, BCCS asked for additional lines to be installed and their old provider was reluctant. The new vendor has increased the number of phones per inmate.

- Ability to block prefix codes such as 800, 900 and 976 calls and any 10 digit numbers.

The ability to block numbers is necessary to help prevent harassment calls, threatening calls and fraud. Jurors, judges, jail and prison personnel, former spouses and victims can be isolated from harassment

which results in fewer complaints to prison management.

- Real-time monitoring, recording equipment and investigative software which is essential for prosecuting law offenders.
- Ability to limit call durations to what fits BCCS' needs allowing more inmates to use the phones at desired times.
- Maximize security, control and commissions.

This allows BCCS to have complete control of inmate telephone services, provides better, more affordable phone service to the inmates and generates significantly more revenue for correctional facilities. Additional income from inmate usage of the system generates revenue to offset operating expenses for the facility.

- Pre-call announcements to identify call origin.

The phone system has pre-call announcements to make sure unsuspecting parties know that the call is coming from a correctional facility. The equipment is capable of interjecting prerecorded announcements at random times throughout the duration of the conversation to the called party indicating the source of the call and that it is collect.

- Requires called party acceptance verification.

The equipment has positive acceptance which requires the called party to actively say "Yes" or press a number on the touch tone pad to concur acceptance.

- Call detail to bolster investigative powers (call information by time of day, usage patterns and other system information) to help investigate crimes or fraud.

The state has a central point where the call detail from all correctional facilities in the State of Illinois can be viewed or accessed. This is essential when trying to detect and prevent unauthorized or fraudulent calls. Reports can be generated including any part of the entire system desired such as cross facility reporting. Commonly dialed number reports are helpful in identifying calling patterns that reveal activity of investigative interest. Reports can be generated for one institution or across institutions.


BCCS is concerned that under billed party preference its

future potential range of vendors will be even more limited than those available when BCCS obtained the above stated improvements. Additional tax-based funding will be necessary to replace lost revenues provided by carrier commissions, as well as replace essential security systems that are currently provided in many cases by the carriers as part of the institution's service.

#### **CONCLUSION**


For all the above-stated reasons, BCCS requests the Commission find that billed party preference should not be adopted or if it is, to except its application at governmental institutions for all the reasons previously stated, given the cost, potential for fraud and revenue losses that would be precipitated.

Respectfully submitted,

  
Assistant Bureau Manager  
Bureau of Communications and  
Computer Services

**CERTIFICATE OF SERVICE**

I, Jim Wischan, hereby certify that a copy of the Comments of Central Management Services were sent on this 6th day of July, 1992, by first class, postage-prepaid mail to those persons listed below:

  
Assistant Bureau Manager  
Bureau of Communications and  
Computer Services

Ms. Donna R. Searey  
Secretary  
Federal Communications  
Commission  
1919 M Street, N. W.  
Room 322  
Washington, D. C. 20554

Sherrie P. Marshall  
Commissioner  
Federal Communications  
Commission  
1919 M Street, N. W.  
Room 826  
Washington, D. C. 20554

Commissioner Ervin S. Duggan  
Federal Communications  
Commission  
1919 M Street N. W.  
Room 832  
Washington, D. C. 20554

Chairman Alfred C. Sikes  
Federal Communications  
Commission  
1919 M Street, N. W.  
Room 814  
Washington, D. C. 20554

Diane Cornell, Deputy Bureau  
Chief (Policy)  
Federal Communications  
Commission  
1919 M Street, N.W., #800  
Washington, D.C. 20003

Commissioner James H. Quello  
Federal Communications  
Commission  
1919 M Street, N. W.  
Room 844  
Washington, D. C. 20554

Cheryl Tritt  
Common Carrier Bureau  
Federal Communications  
Commission  
1919 M Street, N. W.  
Room 800  
Washington, D. C. 20554

Downtown Copy Center  
1919 M Street, N. W.  
Room 246  
Washington, D. C. 20554

James Schlichting  
Chief, Policy & Program  
Planning Division  
Federal Communications  
Commission  
1919 M Street, N. W., #844  
Washington, D. C. 20554

Gary Phillips  
Policy & Program Planning  
Division  
Federal Communications  
Commission  
1919 M Street, N. W., #844  
Washington, D. C. 20554